## REMARKS/ARGUMENTS

Applicant responds herein to the Office Action dated February 21, 2006.

Claims 1-30 are being rejected on grounds of obviousness over Koji (JP11-268827) in view of Shinabara (5,485,644). Reconsideration is requested in view of the amendments to the claims herein and the following remarks.

The inventions described in each of the independent claims in the application are all directed to a substrate processing apparatus. These independent claims 1, 6, 11, 16, 21 and 26 include and specifically call for a first processing chamber which is a liquid chemical processing chamber and a second processing chamber which is a rinse and dry processing chamber.

Advantageously, each of the mentioned claims recites a "third opening" and a "third shutter member". The third opening and the third shutter member are provided between the first processing chamber and the second processing chamber. These elements of these claims provide the structure through which the atmosphere within the first processing chamber which handles liquid chemicals and the atmosphere within the second processing chamber which handles materials involved in a rinse and dry processing are capable of being isolated from each other. This prevents the liquid chemical in the first processing chamber from being exposed to water vapor or dry gas in the second chamber, and similarly prevents a substrate being subjected to a rinse and dry process in the second processing chamber from being exposed to the various components and byproducts which are found in the liquid chemical of the first chamber.

Turning to the references, the Office Action acknowledges that the primary Koji reference fails to disclose the third opening and the third shutter member (as well as two more elements of the independent claims). Accordingly, the Office Action turned to Shinabara, contending that this reference bridges the gap in teachings of the primary Koji reference. Applicant respectfully traverses this assertion.

That is, in Shinabara, the transport unit 6 is arranged between the surface cleaning unit 3 and the rinsing and drying unit 4, with a shutter (not depicted) serving to isolate the transport unit 6 from the units 3 and 4, as described at column 3, lines 16-19 of this reference. The surface cleaning unit 3 described in Shinabara, however, is a processing chamber that supplies <u>deionized</u>

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<u>water</u> to a substrate (Abstract, lines 8-10; column 3, lines 20-21). Therefore, Shinabara does not disclose providing an opening and a shutter <u>between a liquid chemical processing chamber and a rinse and dry processing chamber</u>.

Although not applied to the claims, it is worth noting that the references that were merely cited as being "related" to the application, i.e., Kamikawa, et. al. (6,647,642) and Harris, et. al. (6,575,689), similarly fail to disclose an opening in a shutter between a liquid processing chamber and a rinse and dry processing chamber.

For the reasons stated above, it is respectfully submitted that the prior art of record fails to meet the limitations of the independent claims identified above and, as such, these claims merit to be formally allowed. The remaining claims in the application all contain the limitations of their base, independent claims and impose further limitations thereon which place them even further from the prior art. Accordingly, all claims in the application should be promptly allowed.

Therefore, the Examiner is respectfully requested to reconsider the application, allow the claims as amended and pass this case to issue.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on May 22, 2006:

**MAX MOSKOWITZ** 

Name of applicant, assignee or Registered Representative

Signature May 22, 2006

Date of Signature

Respectfully submitted,

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